

Privacy Policy

Preamble

WED, Inc. (hereinafter referred to as "WED" or "We") has created "Anula", a knowledge database service that automatically save and categorize the history of web pages searched and viewed by users through said service and that suggest personalized articles and contents tailored to users' interests and needs through an advanced recommendation feature (hereinafter referred to as the "Services"). In order to do so, WED needs to process personal information about the users of the Services (hereinafter referred to as the "Users", "Data Subjects" or "you").

WED has established the following Privacy Policy to explain how WED uses the Personal Data gathered through the Services (hereinafter referred to as "Personal Data").

WED collects Personal Data to the extent necessary for achieving its purpose and through lawful and proper manner. If WED obtains Personal Data via third parties, WED observes that the parties obtained such data through lawful and proper manner, and makes sure individuals' rights, interests and privacy are not to be harmed.

WED takes security measures in conformity with laws and regulations for the prevention of leakage, loss, damage, unauthorized access/usage/destruction/alteration, and so forth.

1. Acquisition of Personal Data and Purpose of Use

The processing of Personal Data is based on the contract concluded between WED and the Users, by the use of the Services.

Information we collect as you use our Services

Your apps, browsers & devices

We collect information about the apps, browsers, and devices you use to access the Services.

The information we collect includes browser type and settings, device type and settings, operating system, mobile network information including carrier name and phone number, and application version number. We also collect information about the interaction of your apps, browsers, and devices with our Services, including IP address, crash reports, system activity, and the date, time, and referrer URL of your request.

Your activity

We collect information about your activity in our Services, which we use to recommend personalized articles and contents tailored to Your interests. The activity information we collect may include:

- Terms you search for
- Videos you watch
- Views and interactions with content and ads
- Voice and audio information
- Purchase activity
- People with whom you communicate or share content

Your location information

We may collect information about your location when you use our Services, if You allow this functionality when using our Services.

Your location can be determined with varying degrees of accuracy by:

- GPS and other sensor data from your device
- IP address
- Activity on the Services, such as your searches and places you label like home or work
- Information about things near your device, such as Wi-Fi access points, cell towers, and Bluetooth-enabled devices

The types of location data we collect and how long we store it depend in part on your device and settings.

2. Storage and deletion of Personal Data

Personal Data will be securely stored in Japan.

WED will retain the Personal Data for the period required to fulfill the Purpose of Use mentioned in 1. The specific retention period will be determined by considering the purpose for which the Personal Data is acquired and processed, the nature of the Personal Data, and the legal or business necessity for retaining the Personal Data.

Once this time period has expired, WED will promptly delete Personal Data from WED's storage media.

3. Data we share with third parties

WED might share Personal Data through the use of Cookies as described in 6.

WED might in particular share IDFV or IDFA with third parties for marketing purposes.

IDFV refers to Identifier for Vendors. It is an alphanumeric identifier assigned to users on apps that can be shared across all apps under one developer.

IDFA refers to Identifier for Advertisers. It is a unique, random identifier (device ID) that Apple assigns to every iOS device. It enables advertisers to monitor users' engagement with their ads, and keep track of their post-install activity.

4. Transfer of Data outside of the EEA

Japan

As WED is based in Japan, WED securely process Personal Data mainly in Japan. On January 23, 2019 the European Commission has adopted an adequacy decision on Japan, allowing Personal Data to flow freely between the two economies on the basis of strong protection guarantees.

Third countries

If applicable, WED shall put the appropriate legal framework in place, notably Standard Contract Clauses (SCC) approved by the European Commission.

5. Data Subjects' protection rights

Data Subjects are entitled to the following data protection rights:

The right to access – Data Subjects have the right to request WED for copies of their Personal Data.

The right to rectification – Data Subjects have the right to request WED to correct any information Data they believe to be inaccurate. Data Subjects also have the right to request WED to complete the information they believe to be incomplete.

The right to erasure – Data Subjects have the right to request WED to erase their Personal Data, under certain conditions.

The right to restrict processing – Data Subjects have the right to request WED to restrict the processing of their Personal Data, under certain conditions.

The right to object to processing – Data Subjects have the right to object WED to process their Personal Data, under certain conditions. In particular, where Data Subjects have provided Personal Data voluntarily, or otherwise consented to its use, Data Subjects have the right to withdraw their consent.

The right to data portability – Data Subjects have the right to request WED to transfer the data that WED has collected to another organization, or directly to Data Subjects, under certain conditions.

If Data Subjects make a request based on the above, WED has one month to respond. Data Subjects who would like to exercise any of these rights, can contact WED, by using the following dedicated e-mail address:

support@anula.app

6. Policy regarding use of Cookies

WED uses cookies, SDKs and other information collection modules (hereinafter referred to as the “Cookies”) to provide the Services.

WED may obtain information on Users’ access to the Service, browsing information through the Cookies.

WED will not be liable for any loss or damage arising from the use of Cookies. Cookies do not contain any information that can independently identify or specify the Users.

If Users does not permit the use of Cookies on the Service, the Users can disable Cookies in their browser settings. However, disabling Cookies may impair the convenience of the Services or limit the scope of the Services.

WED uses the following Cookies within the Service:

Service Name	Recipient	Information to be obtained	WED’s Purpose of use	Purpose of use by the Recipient
Adjust	Adjust GmbH.	Device information (ad identifier, device model, OS, country/region information, locale (language), IP address, communication environment) Operation information (authentication information, referrer, date and time.)	To improve this Service To analyze the usage of this Service To measure the effectiveness of advertising	To provide services of analysis and measurement of advertising effectiveness https://www.adjust.com/terms/privacy-policy/
Amplitude	Amplitude, Inc.	Device information (ad identifier, device model, OS, country/region information, locale (language), IP address, communication environment)	To improve and provide that better meet the interests and needs of users, by understanding how they use our products,	To analyze browsing trends and history by Users https://amplitude.com/privacy

		<p>User identifiers (cookies, device identifiers)</p> <p>History information (browsing history, app-specific history)</p> <p>Operation information (authentication information, referrer, date/time)</p>		
AppLovin SDK	AppLovin Corporation	<p>Device information (ad identifier, device model, OS, country/region information, locale (language), IP address, communication environment)</p> <p>User identifiers (cookies, device identifiers)</p> <p>History information (browsing history, app-specific history)</p> <p>Operation information related to advertisements</p>	<p>To improve this Service</p> <p>To measure advertising effectiveness</p> <p>To optimize the delivery of advertisements</p>	<p>To provide services such as analysis and measurement of advertising effectiveness</p> <p>https://www.applovin.com/privacy/</p>
Audience Network SDK	Meta Platforms Inc.	<p>Device information (ad identifier, device model, OS, country/region information, locale (language), IP address, communication environment)</p> <p>User identifiers (cookies, device identifiers)</p> <p>History information (browsing history, app-specific history)</p> <p>Operation information related to advertisements</p>	<p>To improve this Service</p> <p>To measure advertising effectiveness</p> <p>To optimize the delivery of advertisements</p>	<p>For advertising purposes, such as serving and rendering ads, personalizing ads, limiting the number of times an ad is shown to a user, muting ads, and measuring ad effectiveness</p> <p>https://www.facebook.com/privacy/policies/cookies</p>
Bugsnap	Smartbear Software, Inc.	<p>Device information (ad identifier, device model, OS, country/region information, locale (language), IP address, communication environment)</p> <p>User identifiers (cookies, device identifiers)</p>	<p>To ensure the stable provision of this service</p> <p>To detect bugs</p> <p>To collect and analyze crash reports in real time to identify and correct the causes of crashes</p>	<p>To find problems in the front end (the part of a web service or web application that is directly visible to the user)</p> <p>https://smartbear.com/privacy/</p>

		<p>History information (browsing history, app-specific history)</p> <p>Operation information related to advertisements</p> <p>Operation information (authentication information, referrer, date and time)</p> <p>Error and crash information</p>		
Firebase	Google LLC	<p>Device information (ad identifier, device model, OS, country/region information, locale (language), IP address, communication environment)</p> <p>User identifiers (cookies, device identifiers)</p> <p>User authentication information (email address, password, provider-specific information)</p> <p>Notification delivery information</p>	For the appropriate provision of the functions of the Service (authentication by the user (e.g., Google account), delivery and management of notifications)	<p>To measure User engagement</p> <p>https://policies.google.com/privacy/additional?hl=ja</p>
Five SDK	LY CORPORATION	<p>Device information (ad identifier, device model, OS, country/region information, locale (language), IP address, communication environment)</p> <p>User identifiers (cookies, device identifiers)</p> <p>History information (browsing history, app-specific history)</p> <p>Operation information related to advertisements</p>	<p>To improve this service</p> <p>To measure advertising effectiveness</p> <p>To optimize the delivery of advertisements</p>	<p>For advertising purposes, such as serving and rendering ads, personalizing ads, limiting the number of times an ad is shown to a user, muting ads, and measuring ad effectiveness</p> <p>https://www.lycorp.co.jp/ja/company/privacypolicy/</p>
Google Mobile Ads SDK	Google SDK	<p>Device information (ad identifier, device model, OS, country/region information, locale (language), IP address, communication environment)</p>	<p>To improve this Service</p> <p>To measure advertising effectiveness</p>	<p>For advertising purposes, such as serving and rendering ads, personalizing ads, limiting the number of times an ad is shown to a user,</p>

		<p>User identifiers (cookies, device identifiers)</p> <p>History information (browsing history, app-specific history)</p> <p>Operation information related to advertisements</p>	To optimize the delivery of advertisement	<p>muting ads, and measuring ad effectiveness.</p> <p>https://policies.google.com/privacy/additional?hl=ja</p>
Segment	Twilio Inc.	<p>Device information (ad identifier, device model, OS, country/region information, locale (language), IP address, communication environment)</p> <p>User identifiers (cookies, device identifiers)</p> <p>History information (browsing history, app-specific history)</p> <p>Operation information (authentication information, referrer, date/time)</p>	To improve and provide that better meet the interests and needs of users, by understanding how they use our products,	<p>To analyze browsing trends and history by Users</p> <p>https://www.twilio.com/en-us/legal/privacy</p>

7. Change in Policy

WED may revise the details of this Privacy Policy if necessary. Any changes made to this Privacy policy will be published on WED's website and / or otherwise communicated to the Data Subjects.

8. How to contact the Company

Data Subjects who have any questions about WED's Privacy Policy, Personal Data held by WED on them, or would like to exercise one of their data protection rights, can contact WED, by using the following dedicated e-mail address:

support@anula.app

9. Right to contact the appropriate authority

Data Subjects have the right to contact the competent supervisory authority to report a complaint or if they feel that WED has not addressed their concern in a satisfactory manner.

Effective Date: January 23, 2024

WED, Inc.

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